

Does My Project Require a BAAQMD J#? (A guidance document)

- Does the cutting of an outside load-bearing wall for installation of a new door constitute a demolition?
- Is the replacement of a rotted support column a demolition?
- Is the cutting of a hole in a structural support member to allow for passage of a pipe a demolition?

The answer is no. In order to determine whether or not a particular project requires a demolition notification to the Bay Area Air Quality Management District, it is necessary to understand the District's definition of demolition. District Regulation 11, Rule 2, Section 216 defines demolition as:

"Wrecking, intentional burning, moving or dismantling of any load-supporting structural member, or portion thereof, of a building, facility or ship."

Further clarification comes from the District's Compliance & Enforcement Division's Asbestos Demolition/Renovation/Waste Disposal Inspection Guidelines:

A demolition is the "wrecking, intentional burning, moving or dismantling of any load supporting structural member, or portion thereof, of a building, facility or ship."

In practice, the term only applies to the removal of the primary structural elements of a building without their replacement. It applies to tearing down or burning a building, **but not to a remodel, however large or small**. It would not apply, for example, to the removal and replacement or relocation of a non load-supporting interior wall, roofing material, a window, or a door. However, removal of a roof to allow for the building of an additional floor would be considered demolition. EPA has determined that moving a building constitutes demolition, since a major structural element – the foundation – is dismantled and not replaced.

Cutting into a load-bearing wall for installation of a door, replacement of a rotted support column and cutting a hole in a structural support member to allow for passage of a pipe as described above, are examples of activities that do not fit the definition of "wrecking, intentional burning, moving or dismantling."

Please note that the owner or contractor must be aware of the requirement to test suspect building materials such as heating, ventilation, air conditioning ducting and systems; acoustic ceiling material or acoustic plaster; textured or skim coated wall surfaces, cement siding or stucco, or resilient flooring before beginning a remodeling project.

Not all projects will be black or white; there will be gray areas. Feel free to call the District at (415) 749-4762 if there are any questions.

